

1 HONORABLE RICARDO S. MARTINEZ
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8 **UNITED STATES DISTRICT COURT**
9 **WESTERN DISTRICT OF WASHINGTON**

10 COSMOS GRANITE (WEST), LLC, a
11 Washington limited liability company,

12 Plaintiff,

13 v.

14 MINAGREX CORPORATION, d/b/a MGX
15 Stone,

16 Defendant.

17 **NO. 2:19-cv-01697-RSM**

18 **STIPULATED MOTION AND ORDER**
19 **FOR EXTENSION OF CERTAIN**
DEADLINES

20 **Note on Motion Calendar:**
21 **April 10, 2020**

22 WHEREAS, on December 13, 2019, the Court issued an Order Setting Trial Date and
23 Related Dates (Dkt. No. 15);

24 WHEREAS, due to the unprecedeted effects of the COVID-19 pandemic, and the
25 challenges and difficulties associated with conducting discovery under Washington's stay-at-
home order, the parties determined that a change to the dates and schedule previously set by
the Court is necessary;

26 WHEREAS, the parties have agreed to extend certain deadlines due to the challenges
27 and difficulties associated with conducting discovery under Washington's stay-at-home order;

28 WHEREAS, the parties believe that the Court is well acquainted with the
29 circumstances of this national health emergency, and is more than likely aware of the general

30 STIPULATED MOTION AND ORDER FOR EXTENSION OF
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32 Case No. 2:19-cv-01697-RSM

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34 **TOMLINSON**
35 **BOMSZTYK**
36 **RUSS**
37
38 1000 Second Avenue, Suite 3660,
39 Seattle, Washington 98104-1046
40 P/ 206.621.1871 F/ 206.621.9907

1 nature of the impact on law firms during this uncertain time; however, should the Court require
 2 declarations explaining the impact of the COVID-19 pandemic of their respective counsel's
 3 law firms, the parties are more than willing to articulate specific circumstances supporting
 4 good cause for this modification.

5 IT IS HEREBY STIPULATED AND AGREED by and through the undersigned
 6 counsel for Plaintiff and Defendant, in accordance with LCR 7(d)(1) and 10(g), subject to the
 7 approval of the Court, that trial be continued from October 26, 2020 to January 11, 2021 or as
 8 soonest thereafter as the Court permits, and the deadlines in the shall be modified as set forth
 9 below:

10	Event Title	Current Deadline	Proposed Amended Deadline
11	JURY TRIAL DATE	October 26, 2020	January 11, 2021
12	Disclosure of Expert Testimony under 13 FRCP 26(a)(2)	April 29, 2020	July 15, 2020
14	All Motions Related to Discovery must be 15 filed by (see LCR 7(d))	May 29, 2020	August 14, 2020
16	Discovery Completed by	June 29, 2020	September 14, 2020
17	All dispositive motions must be 18 filed by and noted on the motion calendar no later than the fourth Friday thereafter (see LCR 7(d))	July 28, 2020	October 13, 2020
19	Mediation per LCR 39.1(c)(3), if requested by the parties , held no later than	September 11, 2020	November 27, 2020
20	All motions in limine must be filed by 21 and noted on the motion calendar no later than the THIRD Friday thereafter	September 28, 2020	December 14, 2020
22	Agreed pretrial order due	October 14, 2020	December 30, 2020
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STIPULATED MOTION AND ORDER FOR EXTENSION OF
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TOMLINSON
BOMSZTYK
RUSS
1000 Second Avenue, Suite 3660,
Seattle, Washington 98104-1046
P/ 206.621.1871 F/ 206.621.9907

Pretrial conference to be scheduled by the Court.

Trial briefs, proposed voir dire questions, October 21, 2020 January 6, 2021
jury instructions, neutral statement of
the case, and trial exhibits due

DATED this 10th day of April, 2020.

TOMLINSON BOMSZTYK RUSS

By: /s/ Blair M. Russ
Andrew C. Morris, WSBA #55617
Blair M. Russ, WSBA #40374
1000 Second Avenue, 3660
Seattle, WA 98104
Phone: (206) 621-1871
Fax: (206) 621-9907
Email: acm@tbr-law.com
bmr@tbr-law.com

Attorneys for Defendant

SUSMAN GODFREY LLP

By: /s/ Rachel S. Black
Rachel S. Black, WSBA #32204
Alexander W. Aiken (*pro hac vice*)
1201 Third Avenue, Suite 3800
Seattle, WA 98101
Phone: (206) 516-3880
Fax: (206) 516-3883
Email: rblack@susmangodfrey.com
aaiken@susmangodfrey.com

Atorneys for Plaintiff

STIPULATED MOTION AND ORDER FOR EXTENSION OF
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ORDER

Based on the foregoing, IT IS SO ORDERED.

DATED this 15th day of April, 2020.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

Presented by:

By: /s/ *Blair M. Russ*

Andrew C. Morris, WSBA #55617
Blair M. Russ, WSBA #40374
TOMLINSON BOMSZTYK RUSS
1000 Second Avenue, 3660
Seattle, WA 98104
Phone: (206) 621-1871
Fax: (206) 621-9907
Email: acm@tbr-law.com
bmr@tbr-law.com

Attorneys for Defendant

By: /s/ Rachel S. Black
Rachel S. Black, WSBA #32204
Alexander W. Aiken (pro hac vic
SUSMAN GODFREY LLP
1201 Third Avenue, Suite 3800
Seattle, WA 98101
Phone: (206) 516-3880
Fax: (206) 516-3883
Email: rblack@susmangodfrey.com
aajken@susmangodfrey.com

Attorneys for Plaintiff

STIPULATED MOTION AND ORDER FOR EXTENSION OF
CERTAIN DEADLINES - 4
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